

**REPORT OF THE ASSISTANT LOCAL GOVERNMENT BOUNDARIES
COMMISSIONER FOR THE PROPOSED DISTRICT OF
CAUSEWAY COAST AND GLENS**

Trevor Rue, Assistant Local Boundaries Commissioner

November 2021

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Section One: **Background and Statutory Framework**

- 1.1 The commencement of the current review of local government boundaries in Northern Ireland was announced in a public notice on 3rd February 2021. The notice explained the role and remit of the Local Government Boundaries Commissioner and advised that in due course she would publish provisional recommendations and might cause a public hearing to be held in each of the current 11 local government districts. The notice and a subsequent information video placed on the Commissioner's website (<https://www.lgbc-ni.org.uk/>) explained the process and the opportunities for participation in the consultation on the provisional recommendations.
- 1.2 The terms of the review are set out in Article 50 and Schedule 4 of the Local Government (Northern Ireland) Act 1972 as amended. Copies of the legislative framework are available on the Commissioner's website
- 1.3 The Commissioner's provisional recommendations with proposed boundaries and names of 11 districts and their 462 constituent wards were published on the Commissioner's website on 27th July 2021 and announced by way of public notice inviting comments on the proposals made. The consultation was launched on Citizen Space to enable ease of public inspection and maximum public participation. Accessibility points for online access to the proposals and the consultation portal were facilitated at public facilities including Council premises and public libraries by the Commissioner's team in partnership with local councils and with Libraries Northern Ireland. Hard copies of any part of the proposals or the associated maps were made available on request. Other accessibility requirements were promoted on the Commissioner's website including language translation, braille and sign language.
- 1.4 The consultation portal was open for eight weeks and closed on 21st September. Details of the programme of public hearings were notified by press release, social media channels and on the Commissioner's website in September 2021.
- 1.5 All representations received were acknowledged and have been made available for inspection on the Commissioner's website. By the closing date, the Commissioner had received two written representations which related specifically to the proposals for the district of Causeway Coast and Glens. She received a further 13 such representations after the closing date.
- 1.6 I was appointed as an Assistant Commissioner by the Department of Communities on 1st August 2021. My task is to gather, assess and report on the representations made in relation to this proposed district of Causeway Coast and Glens and to submit a report to the Commissioner, including my conclusions and recommendations, within four weeks of the end of the relevant public hearing. I conducted a public hearing in this proposed district at the Lodge Hotel, Coleraine on 13th October 2021.

- 1.7 The public hearing was staged in accordance with government guidance and public health recommendations in respect of the Covid-19 pandemic were observed. The number of people in the room at any one time was limited to 20 and alternative participation was facilitated by a simultaneous online interactive platform.

Public Hearing

- 1.8 The public hearing on the provisional proposals was attended via the online platform by one individual. No one attended in person. The hearing was facilitated in an informal and accessible manner and the participant was afforded a full opportunity to give his views.

My Report

- 1.9 This report presents and addresses the views of the interested parties who made written representations, both before and after the deadline set for submission of such representations, as well as those of the individual who attended the public hearing by virtual means. It seems to me that the relevant provisions of Schedule 4 to the 1972 Local Government Act do not preclude the Commissioner from taking late representations into account. I have set out details of the objections to the Commissioners recommendations and the counter-proposals. I have also set out my conclusions on the issues raised, having regard to the legislative framework of this review. The submissions considered in the report are listed in Section Seven.
- 1.10 As part of my research for this report I have studied and tested the areas of the district where alternative boundaries have been proposed using the geographical information mapping systems of the Land and Property Services of Northern Ireland. This has been facilitated by the staff of Ordnance Survey Northern Ireland and I am indebted to them for their technical assistance. Where I refer to numbers of electors in particular areas, the data relate to the enumeration date of 4th January 2021.

Section Two: District Boundaries

Tullykittagh Road

- 2.1 The Commissioner's approach to district boundary lines is one of minimum intervention. She has, however, proposed that the boundary between the districts of Causeway Coast and Glens and Mid and East Antrim be altered at Tullykittagh Road to take account of a relatively minor defacement to the existing line. She considers this to be a compelling reason to change the boundary. The change would result in the removal of two electors from the Loughguile and Stranocum ward. There have been no objections to this particular proposal.
- 2.2 I therefore recommend that the Commissioner's proposed district boundary line at Tullykittagh Road is affirmed.

Maboy Road

- 2.3 The Member of Parliament for North Antrim wrote to the Commissioner on 17th August 2021 on behalf of a constituent who lives at 19 Maboy Road. (The alternative spelling "Moboy Road" appears on the Provisional Recommendations map and in the Street Names by Ward spreadsheet published on the Commission's website.) The constituent felt she should be placed in the Mid and East Antrim Borough Council area as that council provides all her services. She is currently in Causeway Coast and Glens District, whose council are not providing any of her services.
- 2.4 When visiting the area, I noted that the dwelling in question is within a group of farm buildings set well back from the road on higher ground and served by a winding concrete lane. Maboy Road is currently in Mid and East Antrim District, whereas the group of farm buildings are in Causeway Coast and Glens District. The Commissioner's provisional recommendations indicate no change to this arrangement. Two other dwellings, 17A and 17B, positioned closer to the road, are also in Causeway Coast and Glens District.
- 2.5 Due to a sharp bend on Maboy Road close to the entrance to the laneway which serves No. 19, all the dwellings in the area which take access from that road, apart from 17A, 17B and 19, are within Mid and East Antrim. Of the various services provided by councils in Northern Ireland, rubbish collection is probably the most frequent and conspicuous. I infer from the evidence that the resident of No. 19 leaves her bin at the roadside (within the boundary of Mid and East Antrim) and that as that council's lorries pass along the road, they remove her waste along with that of her neighbours.
- 2.6 The inclusion of Nos. 17A, 17B and 19 Maboy Road in Causeway Coast and Glens District is anomalous from a service delivery perspective. I consider that all three properties should be transferred into Mid and East Antrim District. I have prepared the map in Appendix A which shows a boundary adjustment to achieve this. The new boundary line I am proposing runs from north east to south west. It is shorter than the existing line (which would be retained under the provisional recommendations). In choosing this line, I have had regard to Rule 14 in Schedule 4 to the 1972 Local Government Act and

used field boundaries, features which are readily identifiable. On the enumeration date, there were eight electors in the area affected by my proposed boundary change.

- 2.7 Rule 15 in Schedule 4 to the 1972 Act states that a townland shall not, except where in the opinion of the Commissioner it is unavoidable, be included partly in one district or ward and partly in another. No. 19 Maboy Road and its neighbours are in the extensive Drumcon townland which was comprised of 112 electors on the enumeration date. I have been given no evidence of any local support or demand for the entire townland being severed from Causeway Coast and Glens and placed in Mid and East Antrim. That would create upheaval in both districts. It would, in my opinion, be a disproportionate and unjustifiable response to a very specific local problem. I have therefore concluded that in order to facilitate a practical and sensible solution to this problem, splitting the townland is unavoidable.
- 2.8 I recommend that a small area of land within Drumcon townland, including 17A, 17B and 19 Maboy Road, identified on the map in Appendix A, is transferred from the district of Causeway Coast and Glens to the district of Mid and East Antrim.

Land adjacent to Derry City Airport

- 2.9 By e-mail dated 21st September 2021, a resident of the Derry and Strabane District suggested the transfer of a 2-kilometre strip of land to the east of the City of Derry Airport, running along the southern shore of Lough Foyle, from Causeway Coast and Glens District to Derry and Strabane District, for possible future airport use.
- 2.10 The participant stated that the existing airport is entirely within the district of Derry and Strabane and 100% owned by that council. In his view, the current worldwide slump in aviation is likely to be temporary and air traffic to the airport is likely to increase progressively in the 2025 to 2040 period, indicating an eventual need for an additional runway. He argued that the strip of coastal land to the east is the logical next area for any future airport expansion as no family homes would need to be demolished. Such expansion would provide hundreds of good permanent jobs.
- 2.11 The participant referred to the rise of China and India and argued that in Northern Ireland we need to position ourselves to be beneficiaries of these trends. He said the artificially contrived under-development of the Lough Foyle basin will be corrected, allowing it to support a much larger population with high-tech, environmentally sustainable suburbs and high-speed transport links. He predicted that by the end of this century, the principal employer on Earth will be space technology industries and suggested that North Donegal would be a suitable location for a space port. He stated that, optimally, journey to a space port should be facilitated by a nearby airport and the City of Derry Airport could fulfil that role.
- 2.12 On the day of the hearing, 13th October 2021, the participant submitted a revised map of the proposed transfer area, which is reproduced in Appendix B to this report. He said that although that slightly larger area contains two

homes, they are located well away from the coastal area which, he argued, is the only place where any runway extension could go.

- 2.13 The participant pointed out that the A2 Londonderry to Greysteel road runs eastwards about 1 kilometre south of the lough but stated that the strip he proposed for transfer did not include any fields likely to be used for a planned Greysteel bypass. He said that the eventual bypass would not run too near the coast given the inevitability of a sea level rise this century.
- 2.14 The participant observed that Coleraine, the statistical centre of Causeway Coast and Glens, is over 21 miles distant from the proposed transfer strip, on the other side of a steep mountain often blocked by, or hazardous with, icy roads in winter. He pointed out that by contrast the 6-mile road to Londonderry is unobstructed dual carriageway, facilitating de-icing lorries and gritter vans accessing the strip of land from depots in the city.
- 2.15 The participant suggested that the strip would be a liability to Causeway Coast and Glens Borough Council, given its climatic vulnerability. He stated that the land is virtually at sea level and in the coming century due to climate change it will require a sea wall to defend it. He argued, however, that given the profound strategic significance of the airport, Derry City and Strabane Council would have a vested interest in defending the coastline that would eventually border any new airport runway.
- 2.16 The participant drew attention to the fact that the coastal strip forms the far-flung western tip of the Causeway Coast and Glens District, which has been in existence for six years. Prior to that it was part of Limavady Borough Council for 42 years. Before that, it was in Limavady Rural District Council. He suspected that the people who live in the strip make far more shopping trips to Londonderry than even to nearby Limavady.
- 2.17 The areas depicted on the participant's original map and his revised version of 13th October (Appendix B) both cut across four townlands – Longfield Beg, Cregan, Tullybrisland and Gresteel Beg. He referred to the statutory rule that a townland shall not, except where in the opinion of the Commissioner it is unavoidable, be included partly in one district and partly in another. He said that rule would be a show stopper were it not for the word "unavoidable" but argued that the strategic, semi-regional nature of the land should take precedence over archaic townland boundaries.
- 2.18 The participant acknowledged that some genuine voices might argue that it would be time enough to acquire the 2-kilometre strip when a runway expansion is authorised. However, he said, there were long-term foes of any expansion or strategic development in the North West of Ireland. He gave examples of schemes that had undergone prolonged delays and argued that when a major project is required, the fewer potential obstacles in its way the better. He noted that if the strip of land is not transferred via the current boundary review, the opportunity would be lost for at least another 10 years.
- 2.19 In assessing this representation, I note that the present district boundary between Causeway Coast and Glens and Derry and Strabane from the A2 Clooney Road to Lough Foyle is readily identifiable. It is formed by the border between Longfield More and Longfield Beg townlands and demarcated for the most part by the Muff River. Virtually all (but not all) of the land occupied by

the City of Derry Airport is in the Derry and Strabane District. This part of the boundary line has not been altered since 1973, although in 2015 the territory of the Limavady District was combined with that of three other districts to create the Causeway Coast and Glens District.

- 2.20 The case for changing the district boundary at this location has been presented by an individual citizen who did not claim to speak for Derry City and Strabane District Council. The strip of land in question is not in the Council's ownership or in use for airport purposes. I was given no evidence of any current intention on the part of the Council to extend the airport into this area or of any planning permission for such development. The need for an additional runway was said to be "eventual" rather than immediate.
- 2.21 The idea of expanding the airport in an easterly direction is certainly strategic and perhaps visionary, but in present circumstances it must be regarded as speculative. The original and revised areas suggested for transfer are arbitrary as they are not based on current usage or on any firm proposal specifying the extent of the land that would be required for a future airport extension.
- 2.22 I do not accept that the existing district boundary, if retained, would represent a potential obstacle should Derry City and Strabane District Council wish to pursue a proposal to expand the airport eastwards at some point in the future. At present access to the airport from the A2 goes through part of the Causeway Coast and Glens District. A small corner of an existing runway is also in that district. Article 17 of the Airports (Northern Ireland) Order 1994 empowers councils to provide and maintain airports, and to acquire land for a range of airport purposes either by agreement or compulsorily. There is no requirement that such land must be within the council's own district.
- 2.23 It seems to me that the future use of all or part the identified land for airport purposes is a possibility but not an established fact. The representation is therefore premature. Taking account of all the evidence presented, I am not persuaded that the existing longstanding, readily identifiable district boundary should be altered at this time.
- 2.24 I recommend no change to the district boundary at this location.

Section Three: **Ward Boundaries**

Rasharkin

- 3.1 The objections relating to district boundaries have implications for the outer limits of wards. If my recommendation to transfer a small area of land adjacent to Maboy Road from Causeway Coast and Glens District is accepted, it would inevitably follow that the same area would be removed from Rasharkin Ward.
- 3.2 I recommend that the land identified on the map in Appendix A is removed from Rasharkin Ward.

Windy Hall

- 3.3 The Alliance Party noted that the proposed changes to Windy Hall Ward would involve the removal of the Windyhall housing estate into Dundooan Ward. It considered the Windyhall estate to be part of Coleraine with no substantive connections to the surrounding rural area. It believed the estate would be better served by remaining within Windy Hall Ward.
- 3.4 The Alliance Party went on to argue that if the provisional recommendations for Windy Hall Ward are adopted unchanged, then the ward name would no longer be appropriate. It said the name is used locally to refer to the estate to the north of New Bridge Road, which would be in Dundooan Ward. It suggested that if these changes are to go ahead, then the name Knocklynn would be more appropriate as it is used locally to describe the areas off Knocklynn Road.
- 3.5 In considering this representation, I remind myself of the rules set out in Part III of Schedule 4 to the 1972 Act, in accordance with which recommendations of a Commissioner are to be made. Among other things, these rules require:-
- that regard be had to the desirability of determining ward boundaries which are readily identifiable (Rule 14);
 - that a townland shall not, except where in the Commissioner's opinion it is unavoidable, be included partly in one ward and partly in another (Rule 15);
 - that regard be had to the size, population and physical diversity of the district and the desirability of proper representation of the rural and urban electorate (Rule 17); and
 - that there shall, as far as is reasonably practicable having regard to Rule 17, be substantially the same number of local electors in each ward (Rule 19).
- 3.6 In formulating her preliminary proposals, the Commissioner gave consideration to the meaning of the phrase "substantially the same". She took the approach, with which I agree, that ward electorates within a variation of not more than 10% from the average in the district should be regarded as substantially the same.
- 3.7 If the boundary of Windy Hall Ward established in 2012 had been left unaltered, its electorate would have exceeded the average ward size in Causeway Coast and Glens District by more than 10%. The Commissioner therefore made a preliminary recommendation to transfer an area to the north west of the A26

Belfast to Coleraine road into the neighbouring Dundooan Ward, thereby bringing the electorate of Windy Hall Ward within the permissible range.

- 3.8 As the Alliance Party has noted, the confusion arising from removing the Windyhall housing estate from the ward of the same name could be mitigated by an appropriate change to the ward name. Under the legislative scheme, however, two other factors must be considered. The Commissioner's proposals involve the division of the townland of Windy Hall between two wards, whereas it was previously entirely within Windy Hall Ward. They also transfer the Windyhall estate, which according to the evidence is considered to be part of the town, from the largely urban ward of Windy Hall into the rural ward of Dundooan.
- 3.9 The A26 is undoubtedly a readily identifiable boundary, but the 2012 ward boundary also followed readily identifiable boundaries – field edges as well as a short stretch of Hall Road. A minor defacement has occurred where the 2012 ward boundary (and townland boundary) runs through industrial sheds on Wattstown Crescent but the boundary could be rationalised to run along the backs of their plots, which are readily identifiable.
- 3.10 In weighing up the advantages and disadvantages of the preliminary recommendations, I have concluded that retention of the Windyhall estate within Windy Hall Ward, using the townland boundary with the minor modification I have described, would be more faithful to the statutory rules. On the enumeration date, there were 225 electors in the area between the A26 and the townland boundary to the north west.
- 3.11 The average number of electors per ward in Causeway Coast and Glens District is 2489 and, on the Commissioner's approach, the permissible range is between 2240 and 2737. The effect of retaining the whole of the Windy Hall townland in Windy Hall Ward would be to increase its electorate to 2761. This figure lies outside the permissible range and I have therefore given consideration to whether there is scope for a compensatory transfer of electors from Windy Hall Ward to Dundooan Ward.
- 3.12 In examining the existing ward boundary between Windy Hall and Dundooan to the south east of the A26, I see that it contains a significant area of countryside beyond the current limit of the built-up area of the town. Having regard to the desirability of proper representation of the rural and urban electorate, it seems to me that there is an opportunity in this location to improve the distinction between rural and urban wards.
- 3.13 I therefore see merit in transferring the rural part of the townland of Knockantern, which adjoins Windy Hall townland on its south-western side, into Dundooan Ward. The urban part of the townland would be retained in Windy Hall Ward. The boundary, which is readily identifiable, would run along the outer edge of the Knocklynn, Knockbracken and Knocktarna Grange and Manor housing developments where they abut the countryside. The number of electors affected by this change would be 51.
- 3.14 I appreciate that the boundary I am proposing would split Knockantern townland between two wards but in my opinion this is unavoidable in light of the requirement to have substantially the same number of local electors in each ward and the desirability of proper representation of the rural and urban

electorate. I consider that, on balance, it is a better solution that that shown in the provisional recommendations.

3.15 My proposed changes to the ward boundary between Windy Hall and Dundooan are depicted on the map in Appendix C. The net effect of the changes I am recommending would be to reduce the electorate in Windy Hall Ward by 174 to 2710 and to increase that of Dundooan Ward by 174 to 2491. Both figures are within the permissible range.

3.16 I recommend as follows:-

- that land to the north west of the A26 Newbridge Road, including the Windyhall estate, identified on the map in Appendix C, is retained within Windy Hall Ward; and
- that land to south east of Newbridge Road, identified on the map in Appendix D, is transferred from Dundooan Ward to Windy Hall Ward.

Section Four: Names of District and Wards

- 4.1 I am aware that there have been representations concerning the adoption of a bilingual or trilingual naming policy for local government districts and wards across the whole of Northern Ireland. This is a matter for consideration by the Commissioner when she publishes her revised recommendations.
- 4.2 Several representations specific to the Causeway Coast and Glens District sought recognition for the Irish language version of the district name, *Cósta an Cloghair agus na Glinnte*; and suggested ward names such as *Ros Earcáin* (Rasharkin), *Clochán na bhFomhórach* (Giant's Causeway) and *Dún Lathach* (Dunloy). In my opinion, these suggestions should not be considered in isolation from an overall regional policy setting out the circumstances, if any, in which district and ward names in languages other than English should be adopted.
- 4.3 One individual advocated that old regional place names in the Causeway Coast and Glens District should be used as they reflect the people and history of the area. In the absence of specific examples, I do not believe I can sensibly comment on this particular representation.
- 4.4 Another individual submitted, without giving reasons, that the name of the district should be changed to Causeway Coast. It seems to me that the title Causeway Coast is appropriate for the part of the district that extends eastwards to Ballycastle but does not embrace the no less important part of the district comprised in the Glens of Antrim. I therefore do not support the proposed name change.
- 4.5 In regard to the Alliance Party's objection, as I am recommending that the Windyhall estate should be retained within the Windy Hall Ward, the existing ward name remains appropriate and does not need to be changed.
- 4.6 I therefore have no recommendations to make for changes to the naming of the district or its wards.

Section Five: **Other Issues**

- 5.1 The written submission about Maboy Road was concerned solely with the district boundary and did not stray into other issues.
- 5.2 While the arguments presented in support of the objection concerning land adjacent to Derry City Airport ranged widely, the only change sought was to the district boundary.
- 5.3 The Alliance Party's representation included references to district electoral divisions but I have discounted these as the future grouping of wards for local election purposes is not a matter for this review.
- 5.4 I have therefore no changes to recommend in response to these issues.

Section Six: **Summary of Conclusions**

- 6.1 Recommendation 1: I recommend that the Commissioner's proposed district boundary line at Tullykittagh Road is affirmed.
- 6.2 Recommendation 2: I recommend that a small area of land within Drumcon townland, including 17A, 17B and 19 Maboy Road, identified on the map in Appendix A, is transferred from the district of Causeway Coast and Glens to the district of Mid and East Antrim.
- 6.3 Recommendation 3: I recommend no change to the district boundary in the vicinity of Derry City Airport.
- 6.4 Recommendation 4: I recommend that land to the north west of the A26 Newbridge Road, including the Windyhall estate, identified on the map in Appendix C, is retained within Windy Hall Ward.
- 6.5 Recommendation 5: I recommend that land to south east of Newbridge Road, identified on the map in Appendix D, is transferred from Dundooan Ward to Windy Hall Ward.
- 6.6 Recommendation 6: I recommend that the land identified on the map in Appendix A is removed from Rasharkin Ward.
- 6.7 I have no recommendations to make for changes to the naming of the district or its wards.
- 6.8 I have no recommendations to make in response to any other issues.

Section Seven: **List of Submissions**

Part One: **List of Written Submissions:**

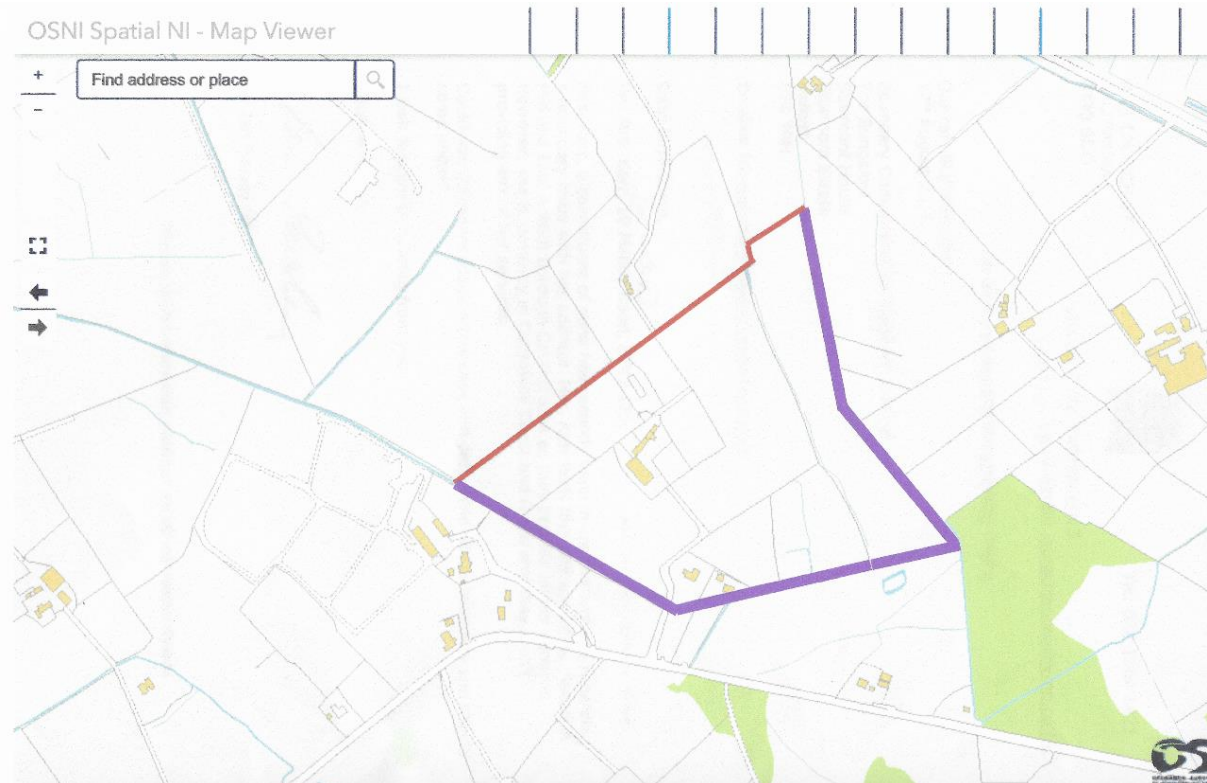
1. Letter from a Member of Parliament dated 17th August 2021, with attached letter of same date from the Clerk and Chief Executive of Mid Antrim Borough Council;
2. E-mail from a resident of the Derry and Strabane District dated 21st September 2021, with associated map;
3. E-mail from the same person dated 13th October 2021, with associated map;
4. Representations from 12 individuals; and
5. Representation from the Alliance Party of Northern Ireland.

Part Two: **Oral Submissions at Public Hearing (via the online platform)**

Resident of the Derry and Strabane District

Section Eight: Appendices

Appendix A: Map showing area proposed to be transferred to Mid and East Antrim and removed from Rasharkin Ward

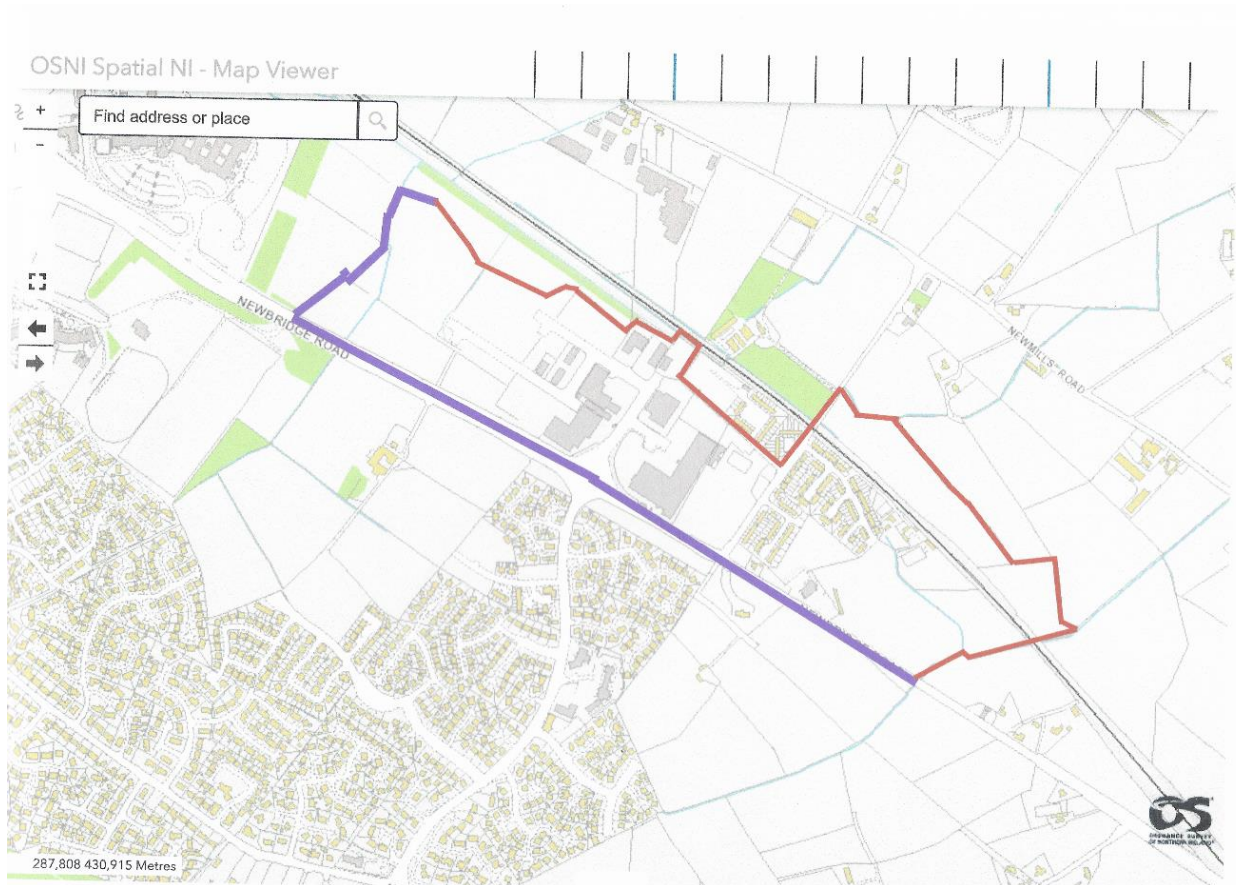


- existing district and ward boundary
- recommended change to district and ward boundary

Appendix B: Map accompanying the e-mail of 13th October 2021

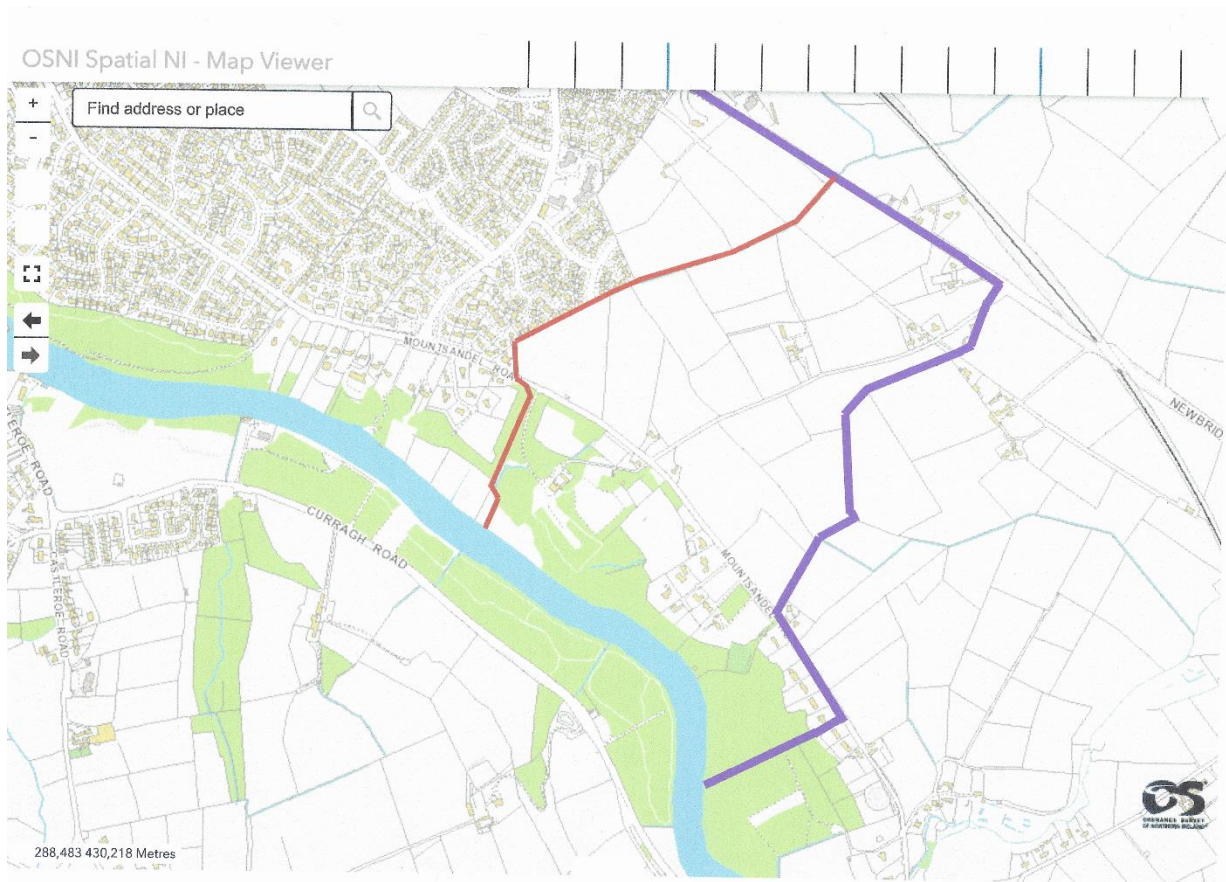




Appendix C: Map showing area proposed to be retained in Windy Hall Ward



- ward boundary proposed in July 2021
- recommended change to ward boundary

Appendix D: Map showing area proposed to be transferred to Dundooan Ward



-  ward boundary proposed in July 2021
-  recommended change to ward boundary